

## Exhibit B

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.  
KARMIN GROUP a/k/a Le GROUPE  
KARMIN,  
KARMIN INDUSTRIES,  
LAMI PRODUCTS, INC. and  
BI-LO, LLC,

Defendants.

Civil Action No.:  
3:15-CV-0214 (FDW)(DSC)

**DECLARATION OF LAWRENCE H. KUNIN**

I, Lawrence H. Kunin, declare as follows:

1. I am a partner of the law firm Morris, Manning & Martin, LLP, and an attorney for Defendant BI-LO, LLC in the above-captioned action. I submit this declaration in support of Defendants' Opposition to Plaintiff's Motion for Leave to File Second Amended Complaint. The facts set forth in this Declaration are personally known to me and I have firsthand knowledge thereof. If called as a witness, I could and would competently testify to all facts within my personal knowledge.

2. In response to Plaintiff's request for information regarding entities that purchased and/or sold the alleged infringing goods at issue in this lawsuit, I disclosed the following entities to Plaintiff's counsel on August 19, 2015: Winn-Dixie Stores, Inc., and Harveys Supermarkets. I also advised Plaintiff that BI-LO, Winn-Dixie, and Harveys (which is now owned by Samson Merger Sub, LLC) are affiliates via a common parent, Southeast Grocers, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 2, 2015.

  
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Lawrence H. Kunin